

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
BALTIMORE DIVISION**

JASON ALFORD, DANIEL LOPER,  
WILLIS McGAHEE, MICHAEL  
McKENZIE, JAMIZE OLAWALE, ALEX  
PARSONS, ERIC SMITH, CHARLES  
SIMS, JOEY THOMAS, and LANCE  
ZENO, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiffs,

vs.

THE NFL PLAYER DISABILITY &  
SURVIVOR BENEFIT PLAN, *et al.*,

Defendants.

**Case No. 1:23-cv-00358-JRR**

**[PROPOSED] ORDER SEALING EXHIBITS  
AND UNREDACTED MEMORANDUM**

Upon consideration of Plaintiffs' Motion to Seal ("Motion to Seal"), it is hereby

**ORDERED** that the Motion to Seal is **GRANTED**. Accordingly, it is further

**ORDERED** that (a) Exhibits H-Q to the Reply Declaration of Benjamin R. Barnett in Further Support of Plaintiffs' Motion for Class Certification and in Support of Plaintiffs' Motion to Exclude, dated April 11, 2025, shall be sealed in their entirety; and (b) the unredacted version of the Memorandum of Law in Support of Plaintiffs' Motion to Exclude and Reply Memorandum of Law in Further Support of Plaintiffs' Motion for Class Certification, dated April 11, 2025, shall be sealed.

Dated: April \_\_, 2025

---

JULIE R. RUBIN  
United States District Judge